

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

ANGELA SANTIAGO,

Plaintiffs,

v.

GEICO ADVANTAGE INSURANCE
COMPANY,

Defendant.

No. 2:22-cv-01370-RSL

**STIPULATED MOTION TO
CONTINUE DISCOVERY DEADLINE**

COME NOW the Plaintiff ANGLEA SANTIAGO (“Plaintiff”) and Defendant GEICO ADVANTAGE INSURANCE COMPANY (“Defendant”) (collectively “the Parties”), by and through their counsel of record, and respectfully move this Court, via stipulation to:

(a) continue the Discovery Deadline from June 4, 2023, to July 17, 2023; and

I. STIPULATION

A. Overview

1. The Parties make this motion in good faith and not for the purpose of delay.
2. This action is for breach of the contract of insurance between plaintiff and defendant providing underinsured motorist coverage and for extra-contractual claims. Defendant denies plaintiff’s claims.

1 3. Under the current case scheduling order, the jury trial in this matter is currently set
2 for **October 2, 2023**. *See* Dkt. 8 (Order Setting Trial Date and Related Dates). The
3 jury trial is expected to last approximately seven (7) days. *Id.*

4 4. Also under the current case scheduling Order, the Discovery Deadline is **June 4,**
5 **2023.**

6 5. For the reasons set forth below, the Parties are requesting an approximate 6-week
7 continuance for the discovery deadline *only*. The Parties request that the Court also
8 extend and modify the deadline as set forth below.

10 **B. Continuance is in the interest of Justice**

11 1. The parties have been and are currently in the process of conferring regarding the
12 proper scope of an FRCP 30(b)(6) deposition. However, the deposition of the
13 30(b)(6) deponent will not be able to occur until after the June 4, 2023, discovery
14 deadline.

15 2. Additionally, the parties are waiting on two rulings from this Court that impact the
16 discovery deadline. *See* Dkts. 23 and 27.

18 **C. Relief Requested**

19 1. In consideration of the above, the Parties respectfully seek an approximate 6-week
20 continuance of the discovery deadline only with all other deadlines to remain the
21 same.

22 2. This stipulated request is not made for the purpose of delay, but rather to allow
23 sufficient time to prepare this case for trial.

24 3. Based on the foregoing, the Parties respectfully request this Court enter an order
25 resetting the discovery deadline in this matter to **July 17, 2023.**
26

For the above reasons, the Parties jointly request that the Court grant this stipulated motion to continue the discovery deadline.

RESPECTFULLY SUBMITTED this 2nd day of June 2023 at Seattle, Washington.

WATHEN | LEID | HALL | RIDER, P.C.

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II. ORDER

IN CONFORMITY with the foregoing Stipulation, **IT IS SO ORDERED.**

Dated this 5th day of June, 2023.



Robert S. Lasnik
United States District Judge